4.14 HAZARDOUS MATERIALS AND ITEMS OF SPECIAL CONCERN

The impacts resulting from the alternatives for renewal of the military land withdrawal are discussed in this section. For each alternative, potential impacts are presented as related to: hazardous chemicals, hazardous waste, medical and biohazardous waste, asbestos, lead, pesticides, low-level radioactive waste, the IRP**,** petroleum storage tanks, and pollution prevention.

4.14.1 Alternative 1

As described in Section 2.1.1, *Military Activities on Withdrawn Lands*, military activities could vary from the same as currently conducted, to an expanded range of capabilities and intensified use. Mission activities take place throughout McGregor Range, and include training through field exercises.

The most potential for impacts from hazardous materials and items of special concern on McGregor Range are lubricants and fuels in vehicles, equipment, and aircraft associated with maintenance and field exercises; chemicals used in routine facility operations and maintenance; and chemicals used during training area maintenance. The potential impacts to the environment from hazardous materials and items of special concern, resulting from Alternative 1, are discussed in this section.

4.14.1.1 Hazardous Chemicals

Storage and use of hazardous chemicals would continue on McGregor Range during training exercises, and facility and training area maintenance. The amounts of hazardous chemicals used may increase due to an increase in the intensity of future training activities that take advantage of currently unused installation capabilities. The amount of ordnance expended on McGregor Range may increase if the development of the existing Cane Cholla and Hellfire Training Area into a state-of-the-art Helicopter Training Complex in southern McGregor Range, and the Heavy Division Training Center that supports additional brigade-size training exercises, were to occur. However, the types of ordnance would remain essentially the same as described in Section 3.14.1.1. The types of hazardous chemicals used would remain approximately the same.

4.14.1.2 Hazardous Wastes

Hazardous wastes may continue to be generated on McGregor Range during the use of some hazardous chemicals. The amount of hazardous waste generated could increase because of the increase in the use of hazardous chemicals associated with the potential training activities described above. The types of hazardous waste would remain essentially the same as described in Section 3.14. Collection, storage, and disposal procedures for other hazardous wastes would be the same as described in Section 3.14.

4.14.1.3 Medical and Biohazardous Wastes

Medical and biohazardous wastes would continue to be generated under this alternative. The types of waste would remain essentially the same, but the amount may increase slightly due to medical support of the potential training activity described above. The increase would not be significant, and waste collection, storage, and disposal procedures would be the same as those described in Section 3.14.1.2. The slight increase in waste generation would not result in adverse impacts.

4.14.1.4 Low-level Radioactive Waste

Low-level radioactive waste is generated from the disposal of items that contain low-level radioactive sources (e.g., medical equipment and various pieces of equipment containing small amounts of

radioactive materials used in nuclear, biological, and chemical [NBC] training). The amount generated may increase because of the medical support of the potential training activity described above. Waste collection, storage, and disposal processes would be the same as those described in Section 3.14. The increase in waste would not result in adverse environmental impacts.

4.14.1.5 Asbestos

Asbestos abatement conducted prior to facility renovation or demolition on McGregor Range could continue to generate asbestos wastes. ACM disposal procedures would be the same as those described in Section 3.14.2.2. Asbestos waste materials would continue to be disposed of in the Fort Bliss sanitary waste landfill. Since total planned landfill capacity is adequate, there would be no adverse impacts.

4.14.1.6 Lead-based Paint

Lead wastes generated from demolition of facilities on McGregor Range would continue to be characterized to determine if it is a hazardous waste. Disposal procedures for hazardous lead wastes would be the same as described in Section 3.14.2.3. The generation of lead wastes would result in no adverse impacts because the wastes would be managed in accordance with applicable standards and regulations.

4.14.1.7 Pesticides

There may be an increase in the amount of pesticides that are applied if the number of facilities increases due to initiatives to more fully use the Fort Bliss Training Complex. The types of pesticides would remain approximately the same as those currently used. The applicators would continue to be periodically recertified, and the program would be conducted in accordance with the *Pesticide Management Plan* (U.S. Army, 1997q). The increased management and use of pesticides would not result in adverse environmental impacts.

4.14.1.8 Petroleum Storage Tanks

Both USTs and ASTs would continue to be used on McGregor Range. Additional tanks could be installed at new training locations if required. These new tanks would meet environmental regulations and fire protection codes in affect at the time of construction. The four-phase system to upgrade the underground storage tanks to meet federal and state requirements would continue to be implemented. The environmental impact from petroleum storage tanks would be insignificant.

4.14.1.9 IRP

Current IRP activities and public interaction would continue, as described in Section 3.14.3.1. Restoration of previously identified sites on McGregor Range would continue and any new sites that are identified would be included in the program. Contaminated wastes removed from IRP sites would result in long-term adverse impacts. However, the overall impact of the program would be beneficial, since contaminated sites would be restored.

4.14.1.10 Pollution Prevention

Pollution prevention initiatives to reduce the amount and types of hazardous chemicals materials used, and the amount and types of hazardous waste that are generated from the use of these chemicals, on McGregor Range would continue to be identified and implemented. The IPPP and the *Hazardous Substance Management System* (U.S. Army, 1996n), described in Section 3.14.3.2, would be

implemented to address pollution prevention and waste minimization issues, and to provide an automated tracking system for hazardous materials. The environmental impacts from the pollution prevention program would be beneficial.

There may be an increase in the use of petroleum products by military training and construction vehicles, and equipment participating in or supporting the potential training activity and installation initiatives described in Section 2.1.1. The potential for hazardous chemical spills during servicing of the vehicles and equipment always exists. However, existing spill prevention and control plans would be adequate to deal with any incidents. Any adverse environmental impacts from facility construction would be short-term.

Asbestos and lead wastes may be generated during facility demolition on McGregor Range. The removal and disposal of these wastes would be the same as those described in Section 3.14. The generation of asbestos and hazardous lead wastes would have adverse environmental impacts.

Natural resource management practices may involve the use of hazardous chemicals such as pesticides on McGregor Range. Measures to preclude impacts from applicable methods of environmental conservation are described throughout this section.

When ROWs or leases on McGregor Range are proposed by third parties, a screening process is required to determine if:

- no hazardous material storage, release into the environment or structures, or disposal will occur on the subject property;
- the release of hazardous material into the environment is not considered probable; or
- the existence, or potential for release, of hazardous materials into the environment or structures exists.

If there was a release, or a potential for release, the proponent must carry out investigation procedures. If there was not a release, or the potential for a release, there would be no adverse impact.

4.14.2 Alternative 2

4.14.2.1 Hazardous Chemicals

There would be a slight decrease in the use of hazardous chemicals because of the curtailment or reduction in current mission activities such as special forces operations training in the foothills environment. The use of hazardous chemicals during training at Tularosa Basin and Otero Mesa would continue at approximately the same rate as described for Alternative 1.

4.14.2.2 Hazardous Wastes

There would be a slight decrease in hazardous waste generation because some training activities would be reduced or curtailed, resulting in a slight decrease in the amount of hazardous chemicals that would be used. Hazardous waste disposal processes would be the same as those described in Section 3.14.1.2. The decreased generation of hazardous wastes would have slight, long-term beneficial environmental impacts.

Ordnance removal from the Sacramento Mountains foothills portion of McGregor Range could generate hazardous wastes in the form of ordnance and explosives hazards, toxic, or other hazardous chemicals.

The amount of hazardous waste would depend on results of studies to determine the degree of contamination, and decisions regarding what ordnance removal and clean-up activities are economically feasible.

4.14.2.3 Medical and Biohazardous Wastes

Under this alternative, the environmental impacts from activities that generate medical and biohazardous wastes would be the same as those described for Alternative 1.

4.14.2.4 Low-level Radioactive Waste

Under this alternative, the environmental impacts from the use of low-level radioactive commodities would be the same as those described for Alternative 1.

4.14.2.5 Asbestos

Since there are no mission facilities in the Sacramento Mountains foothills portion of McGregor Range, environmental impacts from the generation of ACM wastes would be the same as those described for Alternative 1.

4.14.2.6 Lead-based Paint

Because there are no mission facilities in the Sacramento Mountains foothills portion of McGregor Range, environmental impacts from the generation of hazardous lead wastes would be essentially the same as those described for Alternative 1.

4.14.2.7 Pesticides

Under this alternative, the environmental impacts from the use of pesticides would be the same as those described for Alternative 1.

4.14.2.8 Petroleum Storage Tanks

Under this alternative, the environmental impacts from the use of petroleum storage tanks would be the same as those described for Alternative 1.

4.14.2.9 IRP

Under this alternative, the environmental impacts from the IRP would be the same as those described for Alternative 1.

4.14.2.10 Pollution Prevention

Under this alternative, the environmental impacts from the pollution prevention program would be the same as those described for Alternative 1.

4.14.3 Alternative 3

4.14.3.1 Hazardous Chemicals

Under this alternative, the adverse environmental impacts from the use of hazardous chemicals may be reduced, because of the potential reduction in the use of hazardous chemicals due to reduced and/or

curtailed training activities. There would be fewer controlled access FTX sites available for training, training for special forces would be limited because of the loss of the Sacramento Mountains foothills and Otero Mesa training areas, and Roving Sands exercises would be severely limited. There would be a slight decrease in the amount of hazardous chemicals used by the Army in the lands returned to the public domain.

4.14.3.2 Hazardous Wastes

Under this alternative, the adverse environmental impacts from hazardous wastes during training would be reduced because of the reduction in the use of hazardous chemicals and subsequent reduction in the generation of hazardous wastes. There could be long-range beneficial impacts from reduced hazardous waste generation.

The adverse impacts from ordnance removal and clean-up of the Sacramento Mountains foothills and Otero Mesa portions of McGregor Range would be similar to those described under Alternative 2. However, the amount of waste generated could be larger, since Otero Mesa contains impact areas for weapons testing on McGregor Range and no cleanup activities have been carried out in these areas.

4.14.3.3 Medical and Biohazardous Wastes

Under this alternative, the environmental impacts from medical and biohazardous wastes would be similar to those described for Alternative 1, reduced only by the number of personnel supported by WBAMC.

4.14.3.4 Low-level Radioactive Waste

Under this alternative, the environmental impacts from the generation of low-level radioactive wastes would be similar to those described for Alternative 1, reduced only by the number of personnel supported by WBAMC and any reduction in NBC training.

4.14.3.5 Asbestos

There are no mission facilities in the Sacramento Mountains foothills and Otero Mesa portions of McGregor Range. Environmental impacts from the generation of ACM wastes would be essentially the same as those described for Alternative 1.

4.14.3.6 Lead-based Paint

Since there are no mission facilities in the Sacramento Mountains foothills and Otero Mesa portions of McGregor Range, environmental impacts from the generation of hazardous lead wastes would be essentially the same as those described for Alternative 1.

4.14.3.7 Pesticides

Under this alternative, the environmental impacts from use of pesticides would be the same as those described for Alternative 1.

4.14.3.8 Petroleum Storage Tanks

Under this alternative, the environmental impacts from use of petroleum storage tanks would be the same as those described for Alternative 1.

4.14.3.9 IRP

Under this alternative, the environmental impacts from the IRP would be the same as those described for Alternative 1.

4.14.3.10 Pollution Prevention

Under this alternative, the environmental impacts from the pollution prevention program would be the same as those described for Alternative 1.

4.14.4 Alternative 4

4.14.4.1 Hazardous Chemicals

The use of hazardous chemicals would be further reduced, from that described under Alternative 3, because the training scenarios that use hazardous chemicals would be curtailed or limited. For example, the capability to employ a TBM target would be lost, live fire training capability of other missiles would be significantly reduced, aerial gunnery by both fixed- and rotary-wing aircraft would be limited, and siting options for additional controlled access FTX sites would be extremely constrained within the remaining withdrawn area. The use of hazardous chemicals would be severely limited, and would occur during training on that portion of the Tularosa Basin south of New Mexico Highway 506 and on the Army fee-owned in-holdings within the returned area. There would be a decrease in the amount of hazardous chemicals used by the Army.

4.14.4.2 Hazardous Wastes

Under this alternative, the adverse environmental impacts from the generation of hazardous wastes would be further reduced from those described for Alternative 3. The reduction in the amount of hazardous waste generated would result from the curtailment and/or limitations on training activities and the subsequent reduction in the use of hazardous chemicals. Hazardous waste disposal procedures would remain the same as those described in Section 3.14.1.2. Long-term benefits from the reduction in the generation of hazardous wastes would be beneficial.

The adverse impacts from the ordnance removal and clean-up of land to be returned to the public are similar to those described for Alternative 3. Portions of the Tularosa Basin contain impact areas for weapons testing on McGregor Range, and these areas could be contaminated with debris from missile firings and ordnance and explosive hazards.

4.14.4.3 Medical and Biohazardous Wastes

Under this alternative, the environmental impacts from medical and biohazardous wastes would be essentially the same as those described for Alternative 1, reduced only by the number of personnel supported by WBAMC.

4.14.4.4 Low-level Radioactive Wastes

Under this alternative, the environmental impacts from the use of commodities containing low-level radioactive wastes would be similar to those described for Alternative 1, reduced only by the number of personnel supported by WBAMC and any reduction in NBC training.

4.14.4.5 Asbestos

An asbestos survey of mission facilities in the Tularosa Basin portion of McGregor Range, north of New Mexico Highway 506, would be required if the Secretary of the Interior, in consultation with the Secretary of the Army, decides to decontaminate the facilities. Asbestos abatement, if required, could generate asbestos wastes. ACM disposal procedures would be the same as those described in Section 3.14.2.2. The generation of ACM wastes would cause long-term adverse impacts.

4.14.4.6 Lead-based Paint

If it is decided to demolish mission facilities in the Tularosa Basin portion of McGregor Range north of New Mexico Highway 506, any lead waste generated during demolition would be characterized to determine if it is a hazardous waste. Disposal procedures for hazardous lead wastes would be the same as those described in Section 3.14.2.3. The generation of hazardous lead wastes would cause long-term adverse impacts.

4.14.4.7 Pesticides

Under this alternative, the environmental impacts from the use of pesticides would be essentially the same as those described for Alternative 1.

4.14.4.8 Petroleum Storage Tanks

If the Secretary of the Interior, in consultation with the Secretary of the Army, decides to decontaminate ASTs and/or USTs, hazardous petroleum wastes could be generated. Disposal of these wastes would be conducted using the procedures described in Section 3.14.2.7. The generation of hazardous petroleum wastes would cause adverse impacts.

4.14.4.9 IRP

Under this alternative, the environmental impacts from the IRP would be the same as those described for Alternative 1.

4.14.4.10 Pollution Prevention

Under this alternative, the environmental impacts from the pollution prevention program would be the same as those described for Alternative 1.

4.14.5 Alternative 5 – No Action

Under this alternative, military activities would be limited to areas within TAs 8 and 32. Nonmilitary activities on the returned land would include grazing management and potentially, minerals and energy development; both activities that could use hazardous materials. Such new activities would be governed by federal laws and agency policies covering hazardous material use and hazardous waste management.

4.14.5.1 Hazardous Chemicals

Under this alternative, the use of hazardous chemicals by the Army would be reduced substantially, due to the cessation of training on all areas except TAs 8 and 32 on McGregor Range. Hazardous chemicals could be used in these training areas on land obtained in exchange for fee-owned land. Hazardous chemical handling and storage procedures would remain as described in Section 3.14. There could be

long-range beneficial impacts from reduced use of hazardous chemicals by the Army in the lands returned to the public domain.

4.14.5.2 Hazardous Wastes

Under this alternative, the adverse environmental impacts from hazardous wastes generated from the use of hazardous chemicals would be substantially reduced. The hazardous waste resulting from activities conducted at McGregor Range Complex, Meyer Range, and the McGregor ASP would be disposed using the procedures described in Section 3.14.1.2 and would not cause significant adverse impact. Overall, there could be long-range beneficial environmental impacts.

The adverse environmental impacts from ordnance removal and clean-up of land to be returned to the public could be significantly greater than those described for Alternative 4, because all of the Tularosa Basin impact areas may contain debris from missile firings and ordnance and explosive hazards. The amount and composition of the hazards has not been determined, and no cleanup activities have been carried out in these areas.

4.14.5.3 Medical and Biohazardous Wastes

Under this alternative, the environmental impacts from medical and biohazardous wastes would be similar to those described for Alternative 1, reduced only by the number of personnel supported by WBAMC. Any adverse environmental impacts from the generation of medical and biohazardous wastes, attributable to activities on McGregor Range, would be substantially reduced because of the elimination of training on McGregor Range outside of TAs 8 and 32. The portions of Roving Sands conducted on McGregor Range would not be held, eliminating the need to collect, store, and dispose of these wastes, resulting in a long-range beneficial environmental impact.

4.14.5.4 Low-level Radioactive Waste

The adverse environmental impacts from the use of commodities containing low-level radioactive materials would be reduced by reductions in personnel supported by WBAMC, and any reduction in NBC training, because of the elimination of training activities on McGregor Range. A limited number of commodities could be used during training in TAs 8 and 32, but they would not cause a significant adverse impact. Disposal procedures would be the same as described in Section 3.14.2.6. The long-range environmental impacts would be beneficial.

4.14.5.5 Asbestos

Under this alternative, mission facilities scheduled for demolition would have to be surveyed for asbestos. Asbestos abatement prior to demolition of the facilities could result in large quantities of ACM wastes. Disposal of the wastes could be conducted using the procedures described in Section 3.14.2.2, or in an off-post, privately-owned and -operated asbestos disposal facility, depending on contractual arrangements. There would be adverse environmental impacts from asbestos wastes until the disposal efforts are completed. The long-range environmental impact would be beneficial, since the potential for exposure to hazardous asbestos would be eliminated.

4.14.5.6 Lead-based Paint

Lead wastes from the demolition of mission facilities on McGregor Range would be characterized to determine if they are hazardous. There could be an increase in the amount of lead waste generated, since the number of facilities involved would be much larger than under other alternatives. Lead waste disposal

procedures would be the same as those described in Section 3.14.2.3. There would be adverse environmental impacts from lead wastes until the disposal efforts are completed. The long-range environmental impact would be beneficial, since the potential for exposure to hazardous lead would be eliminated.

4.14.5.7 Pesticides

Under this alternative, the Army would retain essential infrastructure in TAs 8 and 32. The environmental impacts from the use of pesticides by the Army on McGregor Range would be the same as those described for Alternative 1, because most pesticide use occurs in and around the mission support facilities in TAs 8 and 32.

4.14.5.8 Petroleum Storage Tanks

If the Secretary of the Interior, in consultation with the Secretary of the Army, decides to decontaminate ASTs and/or USTs, hazardous petroleum wastes could be generated. Disposal of these wastes would be conducted using the procedures described in Section 3.14.2.7. The generation of hazardous petroleum wastes would cause adverse impacts.

4.14.5.9 IRP

Current IRP activities and public interaction would continue, as described in Section 3.14, until the range was returned to the public domain. IRP actions beyond that time would depend on consultations and agreements between the Army and the DOI. Restoration of previously identified sites on McGregor Range would continue, and any new sites that are identified would be included in the program. Contaminated wastes removed from IRP sites would result in long-term adverse impacts, but the overall impact of the program would be beneficial, because contaminated sites would be restored.

4.14.5.10 Pollution Prevention Program

Under this alternative, there would not be any facility construction on McGregor Range outside of TAs 8 and 32 and, therefore, no adverse environmental impacts related to construction would occur on lands returned to the public domain. There would be limited beneficial impacts, since the potential for leaks of hazardous chemicals during construction by the Army would not occur on returned lands.

There could be significant adverse impacts, because quantities of hazardous wastes such as asbestos-containing materials and lead, could be generated during demolition of mission facilities. Disposal procedures for these wastes would be the same as those described in Section 3.14.3.2. The adverse impacts would continue until all demolition and waste disposal was completed. The long-term environmental impacts would be beneficial.

4.14.6 Alternative 6

It is assumed that management practices on the NCA would be similar to the current practices under the RMPA. However, because the precise nature and extent of the congressional action cannot be determined at this time, detailed hazardous materials and items of special concern analysis of this alternative is deferred until the proposal is specified for this type of nonmilitary withdrawal by the DOI.

4.14.7 Cumulative Impacts

The cumulative impacts of activities at McGregor Range, resulting from the use of hazardous materials and items of special concern that might be anticipated on withdrawn land to occur under the five alternatives, were evaluated. Nonmilitary activities on withdrawn lands would not change under Alternatives 1, 2, 3, 4, or 6. The extent of mission activities and impacts would be highest under Alternative 1, in which the land area of the withdrawal would not change. Under Alternative 1, there were a number of activities identified that would use, contain, or produce hazardous materials and items of special interest, but the resulting impacts are expected to be insignificant, occurring on a short-term basis over a localized area. Because these impacts are insignificant, there are not expected to be any cumulative air quality impacts.

Under Alternatives 2, 3, 4, and 5, impacts resulting from the use of hazardous materials and items of special interest are expected to be similar to, or lower than, those of Alternative 1. Consequently, no cumulative effects would be expected if one of the other alternatives were implemented.

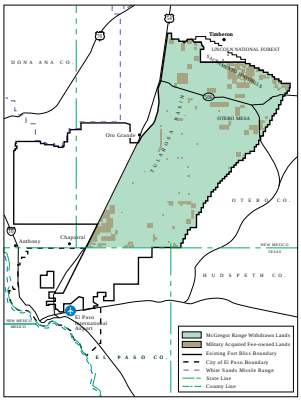
4.14.8 Mitigation

Hazardous chemicals and hazardous wastes are managed in accordance with applicable federal, state, local, and Army rules and regulations. Installation hazardous waste management plans and spill prevention and control plans provide additional mitigation of the impacts. The IPPP and the *Hazardous Substance Management System* will address pollution prevention and waste minimization issues. The use of hazardous chemicals and the generation of hazardous waste are expected to decrease, as pollution prevention initiatives are implemented. A beneficial impact will be attained and the adverse impacts will be further mitigated.

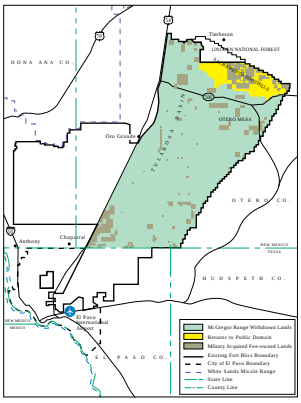
4.14.9 Irreversible and Irretrievable Commitment of Resources

No irreversible or irretrievable commitment of resources would occur.

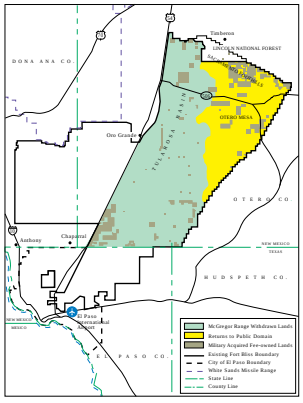
Alternative 1:
Current boundaries of McGregor Range remain the same.



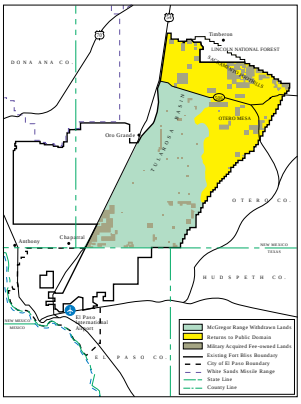
Alternative 2:
Withdraw Tularosa Basin and Otero Mesa portions of McGregor Range for continued military use. Sacramento foothills and Culp Canyon Wilderness Study Area return to public domain.



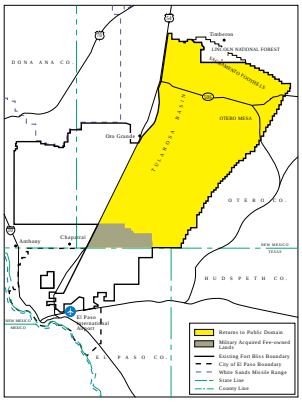
Alternative 3:
Withdraw Tularosa Basin portion of McGregor Range for continued military use.
Otero Mesa and Sacramento foothills return to public domain.



Alternative 4:
Tularosa Basin portion of McGregor Range south of NM Highway 506 withdrawn for continued military use. Otero Mesa, Sacramento foothills, and portion of Tularosa Basin north of NM Highway 506 return to public domain.



Alternative 5,
No Action:
No renewal of McGregor Range land withdrawal, returning entire range to public domain.



Alternative 6:
Congress could designate Culp Canyon WSA as a Wilderness Area. Congress could designate the Otero Mesa and Sacramento Mountains foothills portion of McGregor Range as a National Conservation Area.